

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA :

- v. - :

MENDY GREENBLATT,
a/k/a "Mark Green," :

Defendant. :

- - - - -x

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2-22-17 SEALED INFORMATION

17 Cr.

17 CRIM 121

COUNT ONE

(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From at least in or about 2008 through in or about July 2015, in the Southern District of New York and elsewhere, MENDY GREENBLATT, a/k/a "Mark Green," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, to wit, GREENBLATT participated in a scheme to defraud customers seeking credit-card and debit-card processing services from a company where GREENBLATT worked by, among other things, misrepresenting the fees these customers would incur for the processing services, fraudulently charging some of those fees multiple times, and fraudulently adding additional undisclosed fees or fees for services that were not in fact provided.

JUDGE DANIELS

2. It was a part and an object of the conspiracy that MENDY GREENBLATT, a/k/a "Mark Green," the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Wire Fraud)

The United States Attorney further charges:

3. From at least in or about 2008 through in or about July 2015, in the Southern District of New York and elsewhere, MENDY GREENBLATT, a/k/a "Mark Green," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of

executing such scheme and artifice, to wit, GREENBLATT participated in a scheme to defraud customers seeking credit-card and debit-card processing services from a company where GREENBLATT worked by, among other things, misrepresenting the fees these customers were incurring for the processing services, fraudulently arranging to charge some of those fees multiple times, fraudulently adding additional undisclosed fees or fees for services that were not in fact provided, and in the course of executing such scheme, making and causing to be made interstate communications to victims of this scheme, some of whom were located in the Southern District of New York.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATION

4. As a result of committing the offenses charged in Counts One and Two of this Information, MENDY GREENBLATT, a/k/a "Mark Green," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, which constitutes, or is derived from, proceeds traceable, directly or indirectly, to the offenses alleged in Counts One and Two of this Information.

SUBSTITUTE ASSET PROVISION

5. If any of the above-described forfeitable property, as a result of any act or omission of MENDY GREENBLATT, a/k/a "Mark Green," the defendant,

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third party;

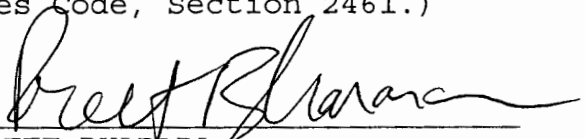
(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


PREET BHARARA
United States Attorney /pk

Form No. USA-33s-274 (Ed. 9-25-58)

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